

Marc Wolstenholme  
5 Shetland Close  
Coventry, England CV5 7LS  
Telephone: 044 7827964404  
Email: [marc@mwwolf-fiction.co.uk](mailto:marc@mwwolf-fiction.co.uk)  
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,  
Plaintiff,  
vs.  
RIOT GAMES, INC.,  
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

*Hon. Fernando M. Olguin*

DECLARATION OF MARC  
WOLSTENHOLME

PLAINTIFF'S EXHIBIT AA- PROOF OF  
SETTLEMENT CORRESPONDENCE FROM  
PLAINTIFF

Dated this: April 06, 2025

*M. WOLSTENHOLME.*

[MARC WOLSTENHOLME]

EXHIBIT AA

Settlement Correspondence from Plaintiff – April 4, 2025

Submitted in Support of Plaintiff’s Opposition to Defendant’s Motion to Dismiss

Email from:

Marc Wolstenholme

marc@mwwolf-fiction.co.uk

To:

Joshua Geller, Aaron Moss, Dan Chang

(Defendant's Legal Counsel)

Subject: SAC Response Deadline & Conditional Proposal for Stipulated

Extension

Date: Friday, April 4, 2025 – 17:02 GMT

EMAIL TEXT (copy exactly):

Dear Counsel,

1 I am writing to remind you of the critical and court-ordered deadlines now upon  
2 us and to reiterate my willingness to proceed in good faith where possible.  
3

4  
5 Confirmed Deadlines from the Case Record:  
6

7 Defendant's Response to SAC: Due today, April 4, 2025 (per Dkt 63)  
8

9 First Settlement Response Due: April 11, 2025  
10

11  
12 Plaintiff's Reply to Counter-Offer Due: April 15, 2025  
13

14 Discovery Responses Due: April 15, 2025  
15

16 Plaintiff's Pre-Settlement Demand: Already submitted and on record.  
17

18  
19 Conditional Request for Joint Stipulation to Extend SAC Response Deadline:  
20

21 I am willing to stipulate to extending the deadline for Riot's response to the SAC  
22 until April 11, 2025, provided that Riot delivers its first full written settlement response today,  
23 April 4, 2025, in good faith and in compliance with the requirements outlined in Dkt 75.  
24  
25  
26  
27

1 Should Riot wish to prioritize settlement, this adjustment would align procedural  
2 deadlines with the spirit of the Court's settlement conference order and avoid unnecessary  
3 filings. Please confirm by return email if you will be sending your settlement response today in  
4 lieu of a SAC response and are willing to file a joint stipulation accordingly.  
5

6  
7 Availability for Meet and Confer Today: I am available for a Meet and Confer  
8 today between:

9  
10 7:30 PM – 12:00 AM GMT (12:30 PM – 5:00 PM Pacific Time)  
11

12  
13 Please confirm a time within this window and whether you prefer Zoom or phone.  
14

15 I will continue to document all conduct that appears to be in bad faith or designed  
16 to delay or obscure proceedings.  
17

18  
19 I remain open to meaningful, good-faith settlement discussions. However, I will  
20 not engage in further procedural avoidance or duplicative litigation conduct.  
21

22  
23 If I do not receive Riot's settlement response or a proper SAC response by the  
24 close of today, I will proceed with appropriate motions.

25 Sincerely,

26 Marc Wolstenholme  
27

**Exhibit AA- Email****SAC Response Deadline & Conditional Proposal for Stipulated Extension**[+ Summarise this email](#)**Marc Wolstenholme** <marc@mwolf-fiction.co.uk>  
to Josh, aaron.moss, dan.chang

Fri 4 Apr, 17:02 (2 days ago)



Dear Counsel,

I am writing to remind you of the critical and court-ordered deadlines now upon us and to reiterate my willingness to proceed in good faith where possible.

Confirmed Deadlines from the Case Record:

Defendant's Response to SAC: Due today, April 4, 2025 (per Dkt 63)

"The Court extends the deadline for Riot to respond to the Second Amended Complaint from March 7, 2025 to April 4, 2025."

First Settlement Response Due: April 11, 2025

Plaintiff's Reply to Counter-Offer Due: April 15, 2025

Discovery Responses Due: April 15, 2025

Settlement Conference Date: April 24, 2025

Plaintiff's Pre-Settlement Demand: Already submitted and on record.

Conditional Request for Joint Stipulation to Extend SAC Response Deadline:

I am willing to stipulate to extending the deadline for Riot's response to the SAC until April 11, 2025, provided that Riot delivers its first full written settlement response today, April 4, 2025, in good faith and in compliance with the requirements outlined in Dkt 75.

Should Riot wish to prioritize settlement, this adjustment would align procedural deadlines with the spirit of the Court's settlement conference order and avoid unnecessary filings. Please confirm by return email if you will be sending your settlement response today in lieu of a SAC response and are willing to file a joint stipulation accordingly.

If no such response is received today, I will expect Riot's formal SAC response to be filed by the close of business, as ordered.

Availability for Meet and Confer Today:

I am available for a Meet and Confer today between:

7:30 PM – 12:00 AM GMT

(12:30 PM – 5:00 PM Pacific Time / Los Angeles time)

Please confirm a time within this window, and specify whether you prefer Zoom or phone.

Please confirm a time within this window, and specify whether you prefer Zoom or phone.

Final Notes:

I will continue to document all conduct that appears to be in bad faith or designed to delay or obscure proceedings.

I remain open to meaningful, good-faith settlement discussions. However, I will not engage in further procedural avoidance or duplicative litigation conduct.

If I do not receive Riot's settlement response or a proper SAC response by the close of today, I will proceed with appropriate motions.

Sincerely,

Marc Wolstenholme

Plaintiff

[marc@mwolf-fiction.co.uk](mailto:marc@mwolf-fiction.co.uk)

1  
2 Declaration of Authenticity:

3 I, Marc Wolstenholme, declare under penalty of perjury that the attached  
4  
5 correspondence is a true and accurate copy of the message I sent to Defendant's counsel on April  
6 4, 2025.

7  
8 Executed on April 06, 2025, in Coventry, England.

9  
10 Signature: *M. WOLSTENHOLME.*

11  
12  
13 Marc Wolstenholme

14 Plaintiff in Pro Per

15 5 Shetland Close

16 Coventry, England CV5 7LS

17 [marc@mwwolf-fiction.co.uk](mailto:marc@mwwolf-fiction.co.uk)  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27